

Memo to File:

Re: Stauffer Chemical Co. Phosphate Mine ACT/047/007

On January 15, 1979, Ron Daniels and Mary Ann Wright met with Stauffer Chemical Company representatives, Fred Riding and Tom Scheffel. The purpose of the meeting was to discuss the requests for variances to Rule M-10 which Stauffer had submitted to the Division in December, 1978.

The following verbal agreements and conclusions were reached concerning variances to Rule M-10.

Rule M-10-2(e) & 5

Construction of berms on highwalls upon final abandonment was acceptable to Stauffer Chemical Company. The key phrase in question was "final abandonment" which was essentially defined as 'final'.

A berm was defined for Stauffer as a "four foot structure of competent rock".

Rule M-10-3 & 13

In regards to impounding structures, Stauffer will leave provisions for drainages at any impounded areas.

Rule M-10-4

Road fills (or road crossings), which are essentially waste dumps, will be left at an angle of repose by Stauffer. All other waste dumps will be left at less than the angle of repose. Stauffer will clarify their original request for a variation to this rule.

Rule M-10-7 & 8

Stauffer stated that the \sim 5-6 roads presently blocking drainages have been in place some 19 years. They maintain that the material is coarse enough to allow water passage but that the road bed is not undermined by water flow. Stauffer plans eventually to fill the entire drainage in some locations at each site with waste rock and thereby create new drainages on the new, higher level of topography.

Tom Suchoski and Mike Thompson will inspect this situation and make a determination, weather permitting, on March 13, 1979.

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Rule M-10-12

The misunderstandings which Stauffer held concerning revegetation were cleared up. It was explained to Stauffer that slickrock footwalls and highwalls could be exempted from revegetation requirements.

Revegetation is being done in conjunction with the U.S.F.S., Division of Wildlife Resources and S.C.S., according to Stauffer. Test plots were begun last fall. The Division requested information on these test plans, concerning what has been done and suggested that revegetation plans could best be submitted as part of an annual report hereafter.

Stauffer discussed the possibility of requesting a variance from having to use "all practical land treatments" to establish vegetation. The Division suggested that such a variance be requested only at the time it is needed, (i.e., when all reasonable attempts have been made and cover is still not restored to 70% of original) and that it be left to the discretion of the Board at the time of request.

In accord with Division request, Stauffer submitted verification of existing cover at the site. The information is enclosed in the file and the Division is satisfied with it.

Stauffer will send a response to the Division's Memo to the Board. This response should include revisions, mentioned in this memo, as a result of the meeting.

MARY ANN WRIGHT

RECLAMATION BIOLOGIST

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